

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION
MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL**

***D.G. Sweigert, c/o
P.O. Box 152
Mesa, AZ 85211
Spoliation-notice@mailbox.org***

July 2, 2019

Jason Goodman, CEO
Multimedia Systems Design, Inc.
252 7th Avenue
Suite 6-S
New York, NY 10001

Clerk of the Court, Room 3000
U.S. District Court
701 E. Broad St.
Richmond, VA 23219

MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

District Judge M. Hannah Lauck

**SUBJECT: PART THREE - ATTEMPTED FRAUD ON THE COURT BY
DEFENDANT GOODMAN**

REF: (a) MANUAL CHAVEZ, III (DOB 03/21/1986), AZ DL DO1566834

Good Morning:

1. This letter addresses the allegation that you (Defendant Jason Goodman) have conspired with yet another “CrowdSource The Truth” (CSTT) social media side-kick (ref: (a)) to suborn perjury and submit tainted evidence (under oath) to this Court to support your wild speculative conspiracy theory insinuations that ignore the truth.

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2. Your attention is kindly directed to paragraph 14 of your ECF Doc. no. 134, see below.

|| Case 3:17-cv-00601-MHL Document 134 Filed 06/27/19 Page 9 of 44 PageID# 2260 ||

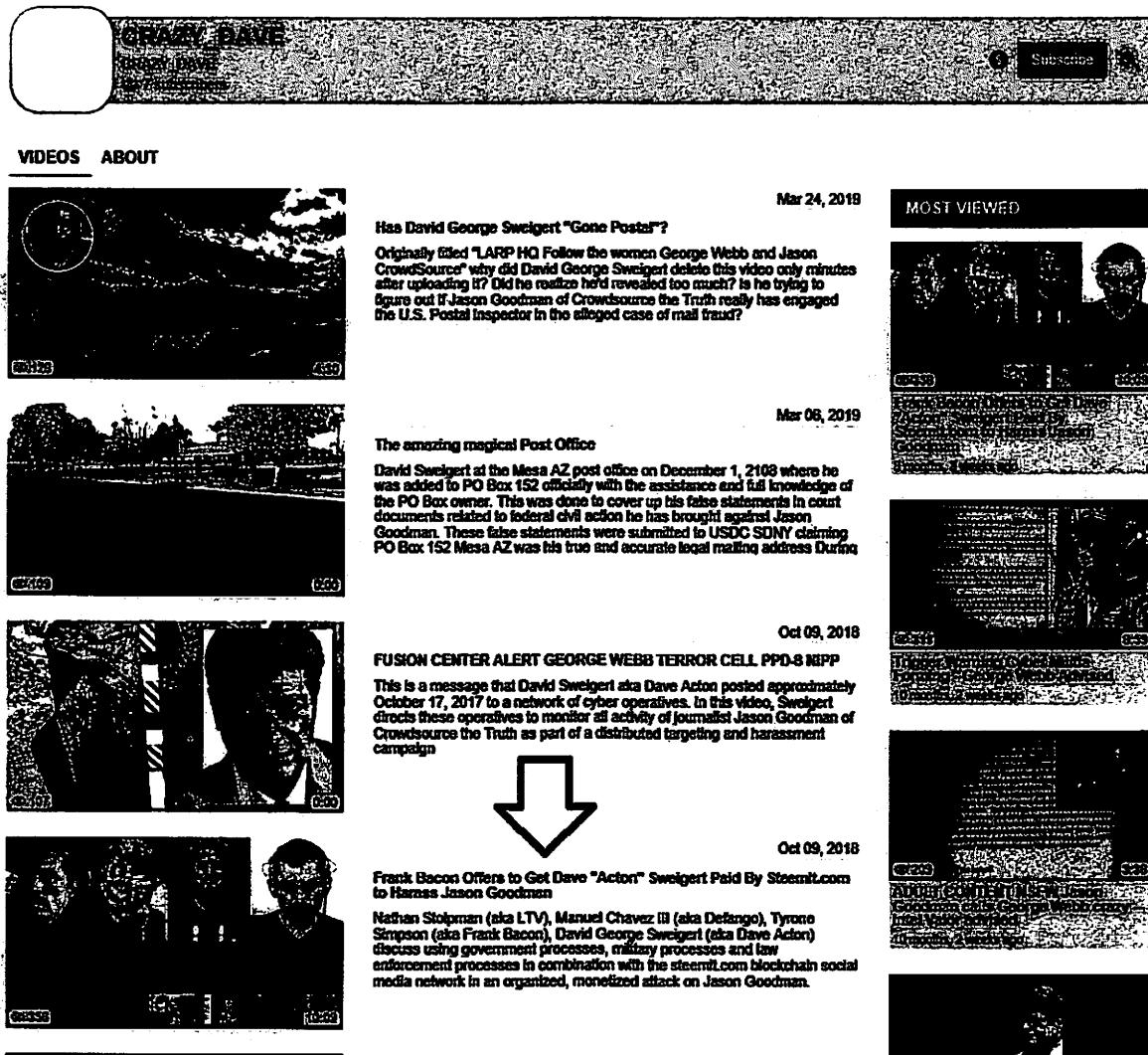
14. Additionally, Chavez provided communications between Plaintiff, Chavez, Thomas
Shoenberger and Tanya Cornwell the wife of counsel for Plaintiff, Steven Biss.
(EXHIBIT C) This email provides evidence that counsel for Plaintiff Biss is using his
wife as a “cutout” or conduit through which he can indirectly communicate with the co-
conspirators and still provide the plausible claim that “I haven’t spoken with (fill in the
name)”. This email provides substantial evidence of the conspiracy alleged by
Defendant. A transcript of a publicly broadcast multiparty phone conversation between
Simpsons, Chavez, Intervenor Applicant and others has been submitted as evidence
previously in this matter (ECF No. 78 EXHIBIT A).

3. Your attention is kindly directed to ECF Doc. No. 78, page 3, shown below.

12 On or around December 2017, in a multiparty video chat (EXHIBIT A) that included
13 Simpson, Intervenor Applicant Sweigert, Chavez, Stolzman and two unknown parties, Simpson
14 and Sweigert agreed to engage in a harassment for pay Campaign against Defendant Goodman.
15 (<https://www.bitchute.com/video/Ez5xgxUk8daU/>). They agreed that the monetary component
16 of The Campaign was to be transacted via the cryptocurrency backed social media network
17 Steemit.com (Steemit). Defendant’s journalistic investigations have revealed evidence
18 indicating Steemit.com is a ponzi scheme intended to absorb money from members of the
19 general public in the form of Bitcoin or other payments when they join the network and purchase
20 “Steem Power” tokens to gain leverage in voting on the network. Steemit enables a covert
21 method of compensating co-conspirator participants in this pay for harassment scheme and is
22 also a money laundering mechanism intended to hide the source of funds and transform an
23 essentially worthless digital currency into real U.S. Dollars. Simpson is an aggressive proponent
24 of Steemit and actively promotes it online and elsewhere, including his Austin Texas based radio
25
26
27

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4. It is instructive to note that in ECF Doc. no. 78, a transcript of the above cited video is provided as EXHIBIT A (listed as "1" in ECF). The video content transcribed into EXHIBIT A (ECF Doc. no. 78) is taken from the following BITCHUTE.COM Internet web platform.

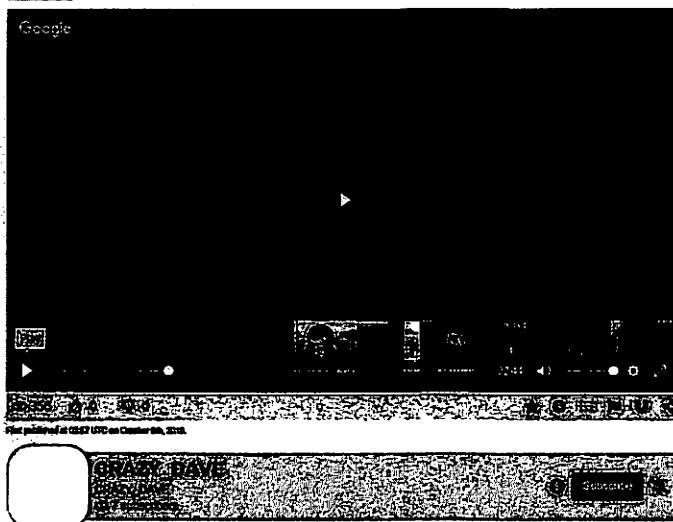


5. The BITCHUTE.COM web-site address provided by you points to the video depicted below:

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FRANK BACON OFFERS TO GET DAVE "ACTON" SWEIGERT PAID BY STEEMIT.COM TO HARASS
JASON GOODMAN

WATCH



Nathan Stopman (aka LTV), Manuel Chavez III (aka Defango), Tyrone Simpson (aka Frank Bacon), David George Swigert (aka Dave Acton) discuss using government processes, military processes and law enforcement processes in combination with the s...

6. The video described in EXHIBIT A (ECF Doc. No. 78) is posted to a web-site channel known as “**CRAZY_DAVE**”. You have acknowledged on many occasions, in other litigation, that you operate, maintain, process and store information on the BITCHUTE.COM “**CRAZY_DAVE**” channel.

7. As you have admitted in other litigation, you have no permission to use the video content of the undersigned, nor his likeness, portrait, photograph, etc. The video content posted to the BITCHUTE.COM “**CRAZY_DAVE**” smear channel has been used without any permission of the video creator. The likeness, photograph and/or portrait of the undersigned is also used without permission. This “**CRAZY_DAVE**” is operated by you for your purposes and includes the use of unauthorized copyrighted materials.

8. The video description (presumably written by you) states:

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CRAZY_DAVE

7 Subscribers [Subscribe](#)

Nathan Stolzman (aka LTV), Manuel Chavez III (aka Defango), Tyrone Simpson (aka Frank Bacon), David George Sweigert (aka Dave Acton) discuss using government processes, military processes and law enforcement processes in combination with the steemit.com blockchain social media network in an organized, monetized attack on Jason Goodman.

9. The video caption cited above seems to encapsulate the allegations you have provide on page 3 of 17, ECF Doc. no. 78 and in para. 14 of ECF Doc. no. 134. However, as you have stated, you have no date for when this recording was posted, distributed, or made public, “[o]n or around December 2017, in a multiparty video chat (EXHIBIT A)...”. You may be interested in some of the transcribed audio (see below).

VOICE: 01:30 Let's talk about how to take the audience up to the next level. And the next thing and all this. Help as many people as I can for the Christmas time for the show. I would be willing to buy anyone an account on Steemit so they can direct message me on the Hoax Wars channel, that includes you Dave.

10. I wish to confirm with you, that you believe this language from “VOICE” is NOT about paying for Steemit accounts during the Christmas season; but, represents an inducement to join “the organization of the monetized conspiracy”. You wrote the headline to the video content, which states:

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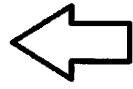
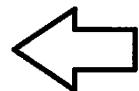
**FRANK BACON OFFERS TO GET DAVE "ACTON" SWEIGERT PAID BY
STEEMIT.COM TO HARASS JASON GOODMAN**

11. The transcribed audio of the undersigned indicates as follows:

VOICE: 01:53. If you look at a unified effort, I got a lot of training from the government, and all the rest of this stuff because I was in the military at a young age. It is a unified effort and ever one has lanes. What's happening is people are getting into each other's lanes. And I told everybody on DEFANGO's show, like two weeks ago, I am the government liaison. I don't want to do anything else. If .. and LTV will tell you, if you need a nasty letter written, Dave's your guy. "

12. Below is presented the same section of transcribed dialogue provided by your "speech processor" in EXHIBIT A of ECF Doc. No. 78. Please note the errors (see red arrows).

17 00:02:00,149 --> 00:02:03,329
lanes and what's happening is people are
55
18 00:02:01,799 --> 00:02:05,159
getting in each other's lanes and I told
56
19 00:02:03,329 --> 00:02:07,409
I told everybody on the fan go show like
57
20 00:02:05,159 --> 00:02:09,119
two weeks ago I'm the government liaison
58
21 00:02:07,409 --> 00:02:11,670
I don't want to do anything else if you
59
22 00:02:09,119 --> 00:02:13,140
need a stand and LTV will tell you if
60
23 00:02:11,670 --> 00:02:14,940
you need a nasty letter
61



DEFENDANT'S OPPOSITION TO THE MOTION TO INTERVENE EXHIBIT A - 4

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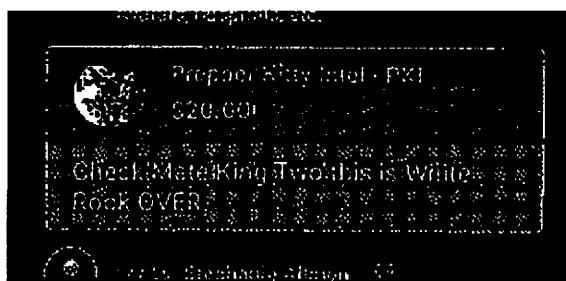
13. I wish to confirm with you, that you believe the above cited commentary represents involvement with “the organization of the monetized conspiracy.” Based on the description you wrote for the video, you believe that this language (cited above) represents a discussion about “using government processes, military processes and law enforcement processes...”.

14. I kindly request that you demonstrate how you procured the electronic stored information (ESI) in the form of the BITCHUTE.COM video content. Please describe each stage of the process you have relied upon to capture, store and protect such video content. Please also guarantee the authenticity of the ESI based upon the description of the steps used to capture, store, re-post and upload said video content. I kindly direct your attention to Rules 104 and 901 of the Federal Rules of Evidence.

15. Your attention is kindly directed to paragraph 24 of your ECF Doc. no. 134, see below.

24. Chavez is an associate of Intervenor Applicant and has been paid by Intervenor Applicant and has received direct instructions from Intervenor Applicant. Intervenor Applicant operates a YouTube channel under the account name “Prepper Kitty Intel PKI”. Many exhibits in this instant legal matter have referenced this YouTube account. YouTube username Prepper Kitty Intel has paid Chavez via YouTube Superchat (**EXHIBIT G**)

16. EXHIBIT G is a screen shot of an apparent DEFANGO TV YouTube podcast.



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17. I wish to confirm with you, that you believe the alleged illustrated \$20.00 donation to DEFANGO TV (displayed in the unauthenticated exhibit) with the text “Check Mate King Two this is White Rook OVER” provides evidence that “Chavez is an associate..” and “Prepper Kitty Intel has paid Chavez...”. At the outset, there is no URL Internet address given (EXHIBIT G, ECF Doc. No. 134) by you for this alleged YouTube “DEFANGO TV” broadcast. Providing the correct evidentiary basis has been explained to you via letters in this litigation and other litigation. Is it a correct assumption that you believe a \$20.00 donation to ref: (a) 30 days ago is the equivalent of the alleged \$1,500.00 Patreon donation made by “AMABISS” 18 months ago; or is there a misunderstanding. Caveat: for your information “Check Mate King Two” is a comical reference to the call sign used in the 1960’s World War II drama television series “COMBAT” staring Rick Jason and Vic Morrow. Below is an example of the television show.



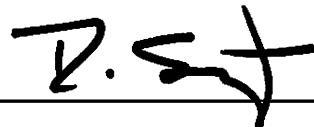
COMBAT! s.1 ep.3: "Lost Sheep, Lost Shepherd" (1962)

Internet URL: <https://www.youtube.com/watch?v=r35lw9CWk-g&t=24s>

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18. Your allegations that somehow the undersigned worked with, worked for, conspired with or engaged in conspiratorial planning with ref: (a) or any of the individuals described in EXHIBIT A of ECF Doc. No. 78, or EXHIBIT G of ECF Doc. No. 134, is false, devoid of truth, unfounded and meritless. I deny all such allegations. Furthermore, it appears the materials you refer to as "evidence" are legally insufficient for consideration to support your wildly stunning conspiratorial allegations.

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 21 day of July, 2019.



D. G. SWEIGERT

Copy provided:

Susan A. Holmes
(Lutzke)
2608 Leisure Drive
Apt. B
Ft. Collins, CO 80525

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

ROBERT DAVID STEELE,

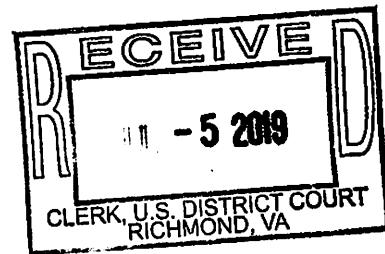
Plaintiff,

-against-

JASON GOODMAN,

Defendant.

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CERTIFICATE OF SERVICE

It is hereby certified that the accompanying materials have been placed in the U.S. Postal Service with First Class mail postage affixed and addressed to the following parties:

**Clerk of the Court
U.S. District Court
701 E. Broad St.
Richmond, VA 23219**

**Jason Goodman
252 7th Avenue
Suite 6-S
New York, NY 10001**

**Susan A. Holmes
(Lutzke)
2608 Leisure Drive
Apt. B
Ft. Collins, CO 80525**

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 2
day of July, 2019.

D. George S. Swigert

**D. GEORGE SWEIGERT, C/O
P.O. BOX 152
MESA, AZ 85211**